

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

KOCH FOODS OF ALABAMA, LLC,)	
an Alabama limited liability company,)	Case No. 07-cv-522-MHT
)	
Plaintiff and Counterclaim-defendant,)	
)	Honorable Myron H. Thompson
v.)	
)	Honorable Terry F. Moorer
GENERAL ELECTRIC CAPITAL)	
CORPORATION, a Delaware corporation,)	
)	
Defendant and Counterclaim-plaintiff.)	

**PLAINTIFF KOCH FOODS OF ALABAMA, LLC's SUGGESTED
VOIR DIRE QUESTIONS TO THE JURY**

COMES NOW Plaintiff Koch Foods of Alabama, LLC, and requests that this Honorable Court pose the following questions to the jury panel:

1. Please tell us:
 - a. your name;
 - b. what you do for a living;
 - c. what your position is and where you work (if you are presently retired, tell us the position and place from which you retired);
 - d. tell us the same information for your husband or wife.
2. Have you ever held a supervisory or managerial position? Explain.
3. Has anyone ever worked for a law firm?
4. Have any of you been a member of the military? If so, please give the following information:
 - a. How long did you serve?
 - b. What was your rank?
 - c. What was your job?
 - d. Is there anyone whose spouse has or had a military career?

5. Have you or any member of your family ever worked for General Electric Company or any of its affiliates, including General Electric Capital Corporation?

If yes, please give:

- a. Person's relationship to you;
- b. Name of company;
- c. Nature of job;
- d. Dates of employment.

6. Do any of you know anyone who has ever worked at General Electric Company or any of its affiliates, including General Electric Capital Corporation?

7. Have you or any member of your family ever worked for Sylvest Farms?

If yes, please give:

- a. Person's relationship to you;
- b. Name of company;
- c. Nature of job;
- d. Dates of employment.

8. Do any of you know anyone who has ever worked for Sylvest Farms?

9. Have you or any member of your family ever worked for Koch Foods of Alabama, LLC?

If yes, please give:

- a. Person's relationship to you;
- b. Name of company;
- c. Nature of job;
- d. Dates of employment.

10. Do any of you know anyone who has ever worked for Koch Foods of Alabama, LLC?

11. Have you or any member of your family ever been employed in the poultry or chicken processing business?

12. Do you know anyone who is employed in the poultry or chicken processing business?

13. Have you or any member of your family ever worked with or been around large-scale equipment used in a chicken processing plant? Any large-scale equipment used in any type of business?

14. Do you know any people who are employed in jobs that require them to work with or around large-scale equipment?

15. Have you ever leased an automobile or other product before?

16. This is a case where the Plaintiff Koch Foods of Alabama, LLC ("Koch Foods") bought a chicken processing plant from Sylvest Farms that had some large pieces of equipment, a freezer and a deboner, that Sylvest Farms, the prior owner of the plant, was leasing from GE Capital, the Defendant in this case. Koch Foods claims that the freezer and the deboner, due to their large size and other reasons, became permanently affixed to or considered a part of the chicken processing plant. Are any of you familiar with the facts of this dispute? How?

17. Have any of you ever had any business, employment or contractual relationship of any kind with General Electric Corporation or General Electric Capital Corporation?

18. Have you ever had any business, employment or contractual relationship of any kind with Sylvest Farms?

19. Have any of you ever been to the Sylvest Farms chicken processing plant?

20. Have any of you ever had any business, employment or contractual relationship of any kind with Koch Foods of Alabama, LLC?

21. Is there anyone who is related to or a friend or associate of the following witnesses expected to testify in this case:

- a. William Wilson;
- b. John Sutehall;
- c. William Perry;
- d. Robert Breakstone;

- e. Mark Kaminsky;
- f. Lyman Campbell;
- g. David Bromley;
- h. Michael Leonard;
- I. Joseph DiSalvo;
- j. Wayne Jones;
- k. David Alafonso;
- l. James Hanley
- m. Joseph Sutehall.

22. The Defendant General Electric Capital Corporation is represented by Alexander Terras, Timothy Scott Harris and Ann Elizabeth Pille of the law firm of Reed Smith Sachnoff & Weaver in Chicago, Illinois. Do you know any of the lawyers named or do you know any members of their law firm? This would include secretaries, clerks, investigators, paralegals, or any other employee.

23. The Defendant General Electric Capital Corporation is also represented by Rusha Christina Smith of Bradley Arant Rose & White LLP of Birmingham, Alabama. Do you know Ms. Smith or any member of her law firm? This would include secretaries, clerks, investigators, paralegals, or any other employee.

24. Have you ever served on a jury with any of the lawyers in the courtroom? If so, please identify them.

25. Do any of you know of any reason why you could not render a fair and impartial verdict in this case after hearing and considering all of the evidence presented and by hearing the oral instructions by the Court of law?

26. Do any of you know of any reason whatsoever which would in any manner keep you from fairly and impartially sitting as a juror if you are selected in this case?

27. Do any of you know any other members of the jury venire? If so,

- a. How do you know them?
- b. How long have you known them?
- c. What is the nature of your relationship with them?

Koch Foods reserves the right to amend its voir dire questions in the interest of justice and for good cause shown to the Court.

Dated: March 31, 2008

Respectfully submitted,

/s/ Constance C. Walker
Constance C. Walker (ASB-5510-L66C)

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that copies of the foregoing were caused to be served upon counsel of record addressed as follows by the ECF system on this 31st day of March, 2008:

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